

From: Paul Pelletier pepelletier3@gmail.com
Subject: Response to September 21, 2022 Request
Date: October 24, 2022 at 3:08 PM
To: Gillian Kassner gillian.kassner@usdoj.gov, Siegel, Jonathan (USANYE) Jonathan.Siegel@usdoj.gov, Lash, Devon (USANYE) DEVON.LASH@usdoj.gov, Elbert, Lauren (USANYE) Lauren.Elbert@usdoj.gov, November, Anna (USANYE) [Contractor] Anna.November@usdoj.gov
Cc: Nanci Clarence nclarence@clarencedyer.com

Gillian: In response to your September 21, 2022 request for “Agreements associated with March 2017 sale of OneTaste and any payments made to Nicole Daedone in connection with (both before and after) her departure from the company in 2017 (including any sale of OneTaste equity). We would also like any communications or documents you have concerning Nicole Daedone’s departure from OneTaste,” we make the following production of documents.

Per our discussion, below I have attached s zip file and an index of the items responsive to such request. Also, as set forth below, and as discussed, many of the requested materials have already been provided to the government.

1 - Agreements associated with the March 2017 sale

- The main agreement regarding the March 2017 sale was a SPA between seller Nicole Daedone and purchasers [REDACTED] on March 3, 2017. This was **requested on June 15, 2022**, “Executed agreements concerning the sale (including the sale of shares of common stock of OneTaste and any of its affiliates.” It was **produced on July 19, 2022**. The \$12 million purchase price can be found on page 5, Section 2.02.

2 - Payments made to Nicole in connection with the March 2017 sale

- There were no payments made to Nicole by OneTaste in connection with the March 2017 sale. She did not receive a severance agreement or exit package.
- OneTaste has already provided all financial payments made by OneTaste to Nicole in several formats:
 - On **May 23, 2022**, EDNY requested:
 - OneTaste cap tables,
 - All OneTaste bookkeeping and accounting records,
 - Copies of OneTaste federal and state income tax returns, and
 - Copies of OneTaste tax filing forms.
 - On **June 6, 2022 we produced** the cap tables, federal and state income tax returns (including Nicole’s K1 distributions).
 - On **June 15, 2022**, EDNY requested, “Documents concerning any payments made to Nicole Daedone”. These were produced on **July 6, 2022**.
 - On **July 28, 2022**, EDNY requested, “All bookkeeping and accounting records prepared or maintained for OneTaste. For each tax year produce financial statements; chart of accounts, general ledger, journal; subsidiary ledgers, trial balance; balance sheet; statement of profit & loss and vendor reports.” These were **produced on August 24, 2022**.

3 - Documents concerning Nicole’s departure from OneTaste

- Those documents are attached hereto but you should know that to extent this request includes Nicole’s

employment documents, they were **produced on July 13, 2022**, including her letter of resignation dated March 2, 2017 (link) in response to the **June 15, 2022, EDNY request** for “Employment agreements, any additional agreements regarding financial payments made to/from these individuals and any OneTaste entities and affiliates, and the contents of personnel files for...Nicole Daedone.”

As we also discussed, payments to Nicole related to the sale of One Taste were not made by One Taste and are not records of One Taste. As we discussed, I agreed that I would endeavor to secure such documentation for you to expedite production to you. I believe that I will have the documentation from [REDACTED] shortly (I am hoping tomorrow). I have not been able to secure the documentation from [REDACTED] attorney but I anticipate that it will be forthcoming, tho not as quickly as the other purchasers' documents.

Finally, as discussed, Nancy and I look forward to meeting you at your earliest convenience to discuss your longstaning investigation and to continue our cooperative efforts in the hopes of bringing this matter to an expeditious and appropriate conclusion. Thanks. Pep

2022.10.24 OneTaste Production
Index.docx



2022.10.22 OneTaste Document
Production.zip



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